

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products Liability Litigation	MDL NO. 2:15-md-02641-PHX-DGC STIPULATION OF DISMISSAL WITHOUT PREJUDICE
This document relates to the cases listed on the Exhibit attached hereto.	

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Plaintiffs whose cases are listed on Exhibit A attached hereto (“Plaintiffs”) and Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc. (“Defendants”), and file this Stipulation of Dismissal without Prejudice, and in support thereof, respectfully show the Court as follows:

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs and Defendants hereby stipulate to the dismissal of the cases listed on Exhibit A without prejudice to the re-filing of same. Plaintiffs and Defendants further stipulate that they are to bear their own costs.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants hereby respectfully request that the Court dismiss the cases listed on Exhibit A in their entirety without prejudice to the re-filing of same and order that these parties are to bear their own costs.

Respectfully Submitted,

s/ David P. Matthews
David P. Matthews
dmatthews@thematthewslawfirm.com
MATTHEWS & ASSOCIATES
2509 Sackett St.
Houston, TX 77098
P: 713.522.5250
F: 713.535.7184

ATTORNEY FOR PLAINTIFFS

s/ Richard B. North, Jr.
Richard B. North, Jr.
richard.north@nelsonmullins.com
NELSON MULLINS RILEY &
SCARBOROUGH LLP
201 17th St. NW, Ste. 1700
Atlanta, GA 30363
P: 404.322.6000
F: 404.332.6397

ATTORNEY FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on October 16, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

s/ David P. Matthews
David P. Matthews

EXHIBIT "A"

Member Case Number	Full Name of Plaintiff	Date Answer or Notice of Appearance Filed (If applicable)
2:17-cv-01956-DGC	Susan King	07/03/2017
2:17-cv-03434-DGC	Mary J. King	11/01/2017
2:18-cv-04376-DGC	Sharon J. King	N/A
2:17-cv-02126-PHX-DGC	Theodore Kirkland	07/24/2017
2:17-cv-03074-DGC	David A. Kissinger	09/25/2017
2:17-cv-01957-DGC	Jonathan Kline	06/30/2017
2:16-cv-02953-DGC	Marie O. Kolpakowski	09/30/2016
2:17-cv-03539-DGC	Susan C. Konkel	11/10/2017
2:16-cv-00205-DGC	James D. Kouns	02/17/2016
2:16-cv-00231-DGC	Lucille A. Kowalczyk	02/17/2016
2:17-cv-03478-DGC	Greg J. Kramer	10/30/2017
2:17-cv-01958-DGC	James D. Kreger	06/30/2017
2:18-cv-04580-DGC	Christopher Kuhns	N/A
2:17-cv-03529-DGC	Bernard G. Kustra	11/06/2017
2:17-cv-01960-DGC	Chad LaForme	06/29/2017
2:18-cv-03716-DGC	Julie L. Lake	N/A
2:18-cv-03646-DGC	Cheryl L. Lamberger	N/A
2:19-cv-00488	Edward Lancaster	N/A
2:17-cv-03450-DGC	Robert E. Lanier	11/02/2017
2:16-cv-04196-DGC	Timothy A. LaRue	12/09/2016
2:18-cv-03691-DGC	Elizabeth L. Lauenborg	N/A
2:19-cv-00544	Randy L. Lawrence	N/A
2:18-cv-03692-DGC	Andrew J. Layer	N/A
2:17-cv-03475-DGC	Irma T. Lazo	11/08/2017
2:18-cv-04377-DGC	Jason S. Lazu	N/A
2:18-cv-03720-DGC	John E. Leddy	N/A
2:18-cv-03756-DGC	Kenneth R. Lee	N/A
2:18-cv-03757-DGC	Timothy D. Lee	N/A
2:19-cv-00540	Cynthia A. Lee	N/A
2:17-cv-03477-DGC	Cristina R. Leguia	11/06/2017
2:16-cv-03299-DGC	William Lehman	10/14/2016
2:17-cv-03524-DGC	Janet L. Lehr	11/08/2017
2:17-cv-03414-DGC	Richard A. Leister	11/02/2017
2:18-cv-03721-DGC	Janice M. Leppert	N/A
2:18-cv-03744-DGC	Dorothy F. Levett	N/A

2:17-cv-01961-DGC	Paulette C. Levin	07/03/2017
2:18-cv-00085-DGC	Lloyd L. Levins	01/18/2018
2:18-cv-03614-DGC	Dan Lewis	N/A
2:16-cv-00200-DGC	Lenore B. Lieberman	02/17/2016
2:18-cv-03701-DGC	James E. Lightcap	N/A
2:18-cv-03766-DGC	Barbara M. Lilly	N/A
2:17-cv-04430-DGC	Clarence I. Lindo	02/06/2018
2:18-cv-03722-DGC	Ervin Lintermoot	N/A
2:18-cv-03639-DGC	Pamela C. Lockard	N/A
2:17-cv-03172-DGC	James C. Loney	09/28/2017
2:19-cv-00417-DGC	Lincoln Lopez	02/14/2019
2:17-cv-03409-DGC	Steven Louie	11/02/2017
2:18-cv-04445-DGC	Cheryl L. Louviere	N/A